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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARLAINA SMITH,

Plaintiff,

v.

TRANS UNION, LLC; EQUIFAX  
INFORMATION SERVICES, LLC;  
EXPERIAN INFORMATION SOLUTIONS,  
INC.; JPMORGAN CHASE BANK, N.A.;  
CITIBANK, N.A.; BANK OF AMERICA,  
N.A.; US. DEPARTMENT OF EDUCATION;  
and NAVIENT SOLUTIONS, LLC,

Defendants.

Case No. 2:22-cv-02041-GMN-NJK

**UNOPPOSED MOTION TO EXTEND  
TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(First Request)**

Defendant Bank of America N.A. ("BANA") by and through its undersigned counsel of record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's Complaint (First Request):

On December 8, 2022, Plaintiff filed her Complaint [ECF No. 1]. The Summons and Complaint were purportedly served on BANA on December 12, 2022, which makes the initial deadline to respond to the Complaint January 3, 2023.

BANA's counsel is still investigating the allegations raised in Plaintiff's Complaint. Further, Plaintiff and BANA have discussed extending the deadline 30-days to February 2, 2023,

1 in order to explore early resolution opportunities. On January 3, 2023, BANA received approval  
2 of the 30-day extension request from Plaintiff's counsel.

3 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline  
4 for BANA to file its response to Plaintiff's Complaint to February 2, 2023. This is the first request  
5 for extension of time for BANA to respond to Plaintiff's Complaint. The extension is requested in  
6 good faith and is not for purposes of delay or prejudice to any other party.

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8 Dated this 3<sup>rd</sup> day of January, 2023.

9 WRIGHT, FINLAY & ZAK, LLP

10 /s/ Jory C. Garabedian

11 Darren T. Brenner, Esq.

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17 *Attorneys for Bank of America, N.A.*

18 **IT IS SO ORDERED:**

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21 UNITED STATES MAGISTRATE JUDGE

22 DATED: January 4, 2023